

**Federal Defenders  
OF NEW YORK, INC.**

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**MEMO ENDORSED**

**BY EMAIL**

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

July 6, 2020

The application is  granted  
 denied



Edgardo Ramos, U.S.D.J  
Dated: July 30, 2020  
New York, New York

**Re: *United States v. Doran Santiago Ramos, 20 Cr. 4 (ER)***

Dear Judge Ramos:

I write to respectfully request that the Court modify Mr. Doran Santiago Ramos's bail conditions to allow him to access the gym inside of his apartment building and exercise outdoors with advance permission from pretrial. [REDACTED]

This Court placed Mr. Ramos on home detention on May 22, 2020. He has been compliant with the strict conditions of home detention. Mr. Ramos now seeks permission to 1) access the small gym located in his apartment building and 2) engage in outdoor exercise—specifically running and jogging—near his home, with advance permission from pretrial. [REDACTED]

[REDACTED] These issues are exacerbated by a sedentary lifestyle. The requested modifications would allow Mr. Ramos to engage in exercises that benefit his health. The government has not yet responded to a request for its position on this modification. Mr. Ramos's pretrial officer, John Moscato, stated that it is pretrial's standard position to object to all requests for exercise outside of the home, but pretrial would accommodate an exercise schedule for Mr. Ramos if the Court grants this modification.

Respectfully submitted,

/s/ Zawadi Baharanyi  
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CC: AUSA Brett Kalikow